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### ROSENMAN & COLIN

1300 19TH STREET, N.W., WASHINGTON, D.C. 20036

TELEPHONE (202) 463-7177

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

NEW YORK OFFICE 575 MADISON AVENUE NEW YORK, NY 10022-2585 TELEPHONE (212) 940-8800 TELECOPIER (202) 429-0046

SAMUEL I. ROSENMAN (1896-1973) RALPH F. COLIN (1900-1985)

September 15, 1992

HOWARD J. BRAUN

Donna R. Searcy, Secretary Federal Communications Commission Washington, D.C. 20554

> Re: MM Docket No. 92-155 FM Table of Allotments

Dear Ms. Searcy:

Enclosed herewith, on behalf of Sunrise Broadcasting of Nebraska, Inc., licensee of Station KBWH(FM), Blair, Nebraska, are an original and four (4) copies of its "COMMENTS OF SUNRISE BROADCASTING OF NEBRASKA, INC. " in the above-referenced proceeding.

Please direct all inquiries and communications concerning this matter to the undersigned.

Very truly yours,

Enc.

cc: As on Certificate of Service (all w/enc.)

SEP 1 5 1992

## Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)
Amendment of Section 73.202(b),	) MM Docket No. 92-155
Table of Allotments,	)
FM Broadcast Stations	) RM-8020
(Blair, Nebraska; Storm Lake,	)
Perry, and Sac City, Iowa)	)

To: Chief, Allocations Branch Policy and Rules Division Mass Media Bureau

#### COMMENTS OF SUNRISE BROADCASTING OF NEBRASKA, INC.

SUNRISE BROADCASTING OF NEBRASKA, INC. ("Sunrise"), licensee of Station KBWH(FM), Blair, Nebraska, by its attorneys, pursuant to §§1.415 and 1.420 of the Commission's Rules, hereby submits its comments in support of the Notice of Proposed Rule Making and Order to Show Cause ("NPRM"), 7 FCC Rcd 4590 (MMB 1992), in the above-captioned proceeding. In support hereof, Sunrise shows the following:

1. On June 1, 1992, Sunrise filed a Petition for Rulemaking ("Petition") (RM-8020), in which it proposed, inter alia, that the FM Table of Allotments (§73.202(b) of the Commission's Rules) be amended to substitute Channel 268C3 for Channel 292A at Blair, Nebraska, and that the license of Station KBWH(FM) be modified to specify operation on that channel. On July 23, 1992, the Commission released the subject NPRM, which fully adopted Sunrise's proposal, except

that the NPRM proposed to substitute Channel 248A, instead of Channel 265A, for Channel 286A at Sac City, Iowa.

- 2. Sunrise hereby incorporates by reference its June 1, 1992 Petition and all of the arguments and exhibits presented therein in support of the proposed amendment of the Table of Allotments and modification of the licenses of Stations KBWH(FM), KAYL-FM, and KDLS-FM. However, Sunrise also fully endorses the NPRM's proposed substitution of Channel 248A, instead of Channel 265A, at Sac City, since that channel can be allotted without conflicting with any proposed allotment or pending application.
- 3. If Sunrise's license is modified as proposed in the NPRM, Sunrise restates its intention to promptly upgrade its facilities upon Commission approval of an FCC Form 301 minor modification application to be filed by Sunrise. Moreover, as stated in the <u>Petition</u>, Sunrise reiterates its willingness to assume the lawful and reasonable expenses incurred by Stations KAYL-FM and KDLS-FM in changing their frequencies.

WHEREFORE, in view of the foregoing, Sunrise respectfully requests that the Commission should amend the FM Table of

Allotments and modify the licenses of Stations KBWH(FM), KAYL-FM, and KDLS-FM as proposed in the NPRM.

Respectfully submitted,

SUNRISE BROADCASTING OF NEBRASKA, INC.

Howard J. Braun Jerold L. Jacobs

ROSENMAN & COLIN 1300 - 19th Street, N.W. Suite 200 Washington, D.C. 20036 (202) 463-7177

Its Attorneys

Dated: September 15, 1992

#### CERTIFICATE OF SERVICE

I, Katherine D. Wright, a secretary in the law offices of Rosenman & Colin, do hereby certify that on this 15th day of September, 1992, I have caused to be mailed, or hand delivered, a copy of the foregoing "COMMENTS OF SUNRISE BROADCASTING OF NEBRASKA, INC." to the following:

Michael C. Ruger, Chief\*
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W.
Room 8322
Washington, D.C. 20554

Ms. Leslie K. Shapiro
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W.
Room 8313
Washington, D.C. 20554

James J. Freeman, Esq.
Reed, Smith, Shaw & McClay
1200 - 18th Street, N.W.
Washington, D.C. 20036
COUNSEL FOR NORTHWEST IOWA
BROADCASTING CO. (KAYL-FM)

John S. Neely, Esq.
Miller & Miller, P.C.
1990 M Street, N.W.
Suite 760
Washington, D.C. 20036
COUNSEL FOR PERRY BROADCASTING CO. (KDLS-FM)

Katherine D. Wright